

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 ) CASE NO. 22 B 07209  
Delisa Clinton, ) HON. Judge Timothy A Barnes  
 ) CHAPTER 13  
DEBTOR. )

**NOTICE OF MOTION**

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604;

See Attached List via U.S. Mail.

PLEASE TAKE NOTICE that on July 14, 2022 at 9:30 a.m., I shall appear before the Honorable Judge Timothy A Barnes, or any judge sitting in this Judge's stead, and present the attached Motion to Extend Automatic Stay.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video,** use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone,** call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 161 329 5276 and the password is 433658. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that she served a copy of this notice and the attached motion, on each entity shown on the attached list at the address shown and by the method indicated on the list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on July 1, 2022.

Respectfully Submitted,

/s/ Megan Swenson  
Attorney for Debtor  
The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 248-7660  
[mswenson@semradlaw.com](mailto:mswenson@semradlaw.com)

0752-1  
Case 22-07209  
Northern District of Illinois  
Eastern Division  
Tue Jun 28 13:31:47 CDT 2022

Capital One Auto Finance  
PO Box 4360  
Houston, TX 77210-4360

City Of Chicago Department Of Finance  
333 South State Street Suite 330  
Chicago, IL 60604-3965

Comed  
3 Lincoln Center  
Bankruptcy Section  
Oakbrook Terrace, IL 60181-4204

Credit Coll  
16 Distributor Drive, Suite 1  
Morgantown, WV 26501-7209

Dept Of Ed/Navient  
PO BOX 9635  
WILKES BARRE, PA 18773-9635

Easy Accept  
3632 NORTH CICERO STE A  
CHICAGO, IL 60641-3641

Enterprise  
4700 Southwest Highway  
Oak Lawn, IL 60453-1824

First Premier Bank  
PO Box 7999  
c/o Stephen Dirksen  
Saint Cloud, MN 56302-7999

Hertz Rent A Car  
35 E. Plainfield Rd  
La Grange, IL 60525-3085

Irs 1  
P.O. Box 7346  
Philadelphia, PA 19101-7346

(p)PEOPLES GAS LIGHT & COKE COMPANY  
200 EAST RANDOLPH ST  
CHICAGO IL 60601-6433

Delisa Clinton  
320 W. Illinois St., Apt. 1600  
Chicago, IL 60654-7832

Marilyn O Marshall  
224 South Michigan Ste 800  
Chicago, IL 60604-2503

Mitchell Shanks  
The Semrad Law Firm, LLC  
20 S. Clark Street, 28th floor  
Chicago, IL 60603-1811

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Peoples Gas  
200 E. Randolph  
Chicago, IL 60601

End of Label Matrix	
Mailable recipients	17
Bypassed recipients	0
Total	17

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DEBTOR. )

**MOTION TO EXTEND AUTOMATIC STAY**

NOW COMES Delisa Clinton, Debtor, by and through Debtor's attorneys, The Semrad Law Firm, LLC, and moves this Honorable Court to extend the automatic stay, and in support thereof states as follows:

1. That the Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C on June 28, 2022.
2. That this case has not yet been confirmed by this Honorable Court.
3. That the Debtor filed a prior Chapter 13 case, with case number 21 B 12087, which was filed on October 22, 2021 and was later dismissed on April 25, 2022. Please see attached Exhibit A for Debtor's Affidavit. Please see Exhibit B for prior I & J schedules. Please see Exhibit C for Debtor's current I & J schedules.
4. Debtor's prior case was dismissed for failure to make plan payments.
5. In the prior case, Debtor's aunt and grandmother passed away in December of 2021 due to COVID-19.
6. In the prior case, due to Debtor's aunt and grandmother passing away, Debtor incurred unexpected funeral expenses. Due to the unexpected

expenses, Debtor was unable to maintain her regular household expenses and plan payments, and a deficiency accrued.

7. As a result, Debtor's case was dismissed.
8. In the current case, Debtor is current on her household expenses.
9. In the current case, Debtor is working full-time doing Lyft and receiving Link.
10. In the current case, Debtor is in a position to proceed and has filed this case in good faith.
11. That, equitably, the stay should be extended.

WHEREFORE, Debtor, Delisa Clinton, prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order extending the automatic stay, for the reasons set forth in this Motion; and
- B. For such other and further relief this court deems just and proper.

Respectfully Submitted,

/s/ Megan Swenson  
Attorney for Debtor  
The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 248-7660